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8 Attorneys for AMERICAN CASUALTY COMPANY OF READING, PA; and NATIONAL  
9 UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

12 UNITED STATES of AMERICA for the Use  
13 and Benefit of WEBCOR CONSTRUCTION,  
14 INC. dba WEBCOR BUILDERS, and  
WEBCOR CONSTRUCTION, INC. dba  
WEBCOR BUILDERS,

16 Plaintiffs,

17 vs.

18 DICK/MORGANTI, a joint venture; DICK  
CORPORATION; THE MORGANTI  
GROUP; AMERICAN CASUALTY  
COMPANY OF READING, PA;  
NATIONAL UNION FIRE INSURANCE  
COMPANY OF PITTSBURGH, PA, and  
DOES 1 through 10, inclusive,

23 Defendants.

15 Case No.: 3:07-CV-02564-CRB

**NOTICE OF MOTION AND MOTION  
TO STAY PROCEEDINGS**

Hearing Date: August 24, 2007

Hearing Time: 10:00 a.m.

Location: Courtroom 8 (19th Floor)

Judge: Hon. Charles R. Breyer

25 **TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEY OF RECORD:**

26 PLEASE TAKE NOTICE that on August 24, 2007 at 10:00 a.m., or as soon after as may  
27 be heard, in Courtroom 8 of the above-captioned Court, located at 450 Golden Gate Avenue,  
19th Floor, San Francisco, California 94102, Defendants AMERICAN CASUALTY

1 COMPANY OF READING, PA and NATIONAL UNION FIRE INSURANCE COMPANY  
2 OF PITTSBURGH, PA will, and hereby do, move the Court for an order staying plaintiffs'  
3 action against all defendants herein.

4 This motion is based on the accompanying Memorandum of Points and Authorities, the  
5 Declaration of Michael T. Ambroso, the papers and pleadings on file in this action, and any oral  
6 argument this Court may allow.  
7

8 Dated: July 20, 2007

PECKAR & ABRAMSON, P.C.

9  
10 By: \_\_\_\_\_ /s/  
11 Raymond M. Buddie  
12 Timothy E. Elliott  
13 Rick W. Grady  
14 Attorneys for AMERICAN CASUALTY  
COMPANY OF READING, PA; and  
NATIONAL UNION FIRE INSURANCE  
COMPANY OF PITTSBURGH, PA  
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